

JOHN GEORGE RONIS  
JAN EDWARD RONIS  
JASON A. RONIS

LAW OFFICES OF  
**Ronis & Ronis**  
105 WEST F STREET  
THIRD FLOOR  
SAN DIEGO, CALIFORNIA 92101-6036

TELEPHONE (619) 236-8344  
FAX (619) 236-8820  
info@ronisandronis.com

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/26/2021

By ECF

October 25, 2021

**MEMORANDUM ENDORSED**

Honorable Gregory H. Woods  
United States District Court  
500 Pearl St.  
New York, NY 10007-1312

Re: Case No. 16-cr-00680-GHW, U.S. v. Madrid

Dear Judge Woods:

Both Mr. Meza and Mr. Cazarez along with their counsels are requesting a continuance of the current sentencing date from November 22, 2021, to a date convenient to the Court in January 2022. As the Court will recall, co-counsel for Mr. Araujo, Gretchen von Helms, was involved in a serious accident on October 18, 2020 and was expected to be out of work for at least one year and is presently in the same status with no definite return date. She had acted as lead counsel in Mr. Araujo's representation. Mr. Valencia has stepped in as lead counsel and is requesting a continuance to a suggested January date to properly prepare sentencing documents on Mr. Araujo's behalf.

Mr. Ronis was informed that his client may be seeking new counsel and to that end was contacted by David Wilkstrom, indicating that he would likely be retained by Mr. Cazarez to represent him at sentencing. Mr. Wilkstrom indicated that he expected to have a final decision this week as to whether or not he would be entering the case and seeking a continuance of the presently scheduled date.

Both Mr. Ronis and Mr. Valencia further submit that the Covid disruption of the past 18 months has severely impacted their ability to travel and meet with their respective clients due to restrictions imposed by the Federal facility in which they have been housed and inconsistent travel limitations.

The Government has no objection to this request with the understanding that all parties will be prepared to proceed by mid-January.

It is respectfully requested that a new sentencing date be set any date convenient to the Court in the later part of January, or anytime thereafter, and that new motion filing dates be set during the month of January that are convenient to the Court. We thank the Court for your understanding of this matter.

I have informed all counsel and there is no objection to this request.

Respectfully submitted,  
<sup>/s/</sup>  
*Jan Edward Ronis,  
Gretchen C. von Helms,  
Guadalupe Valencia*

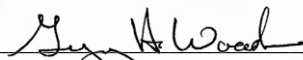
cc: Assistant United States Attorney, Amanda Houle (By ECF and email)

Application granted in part. The sentencing hearings as to defendants Madrid and Meza are adjourned to January 19, 2022. The hearing as to defendant Sinohe Antonio Araujo Meza will be held at 10:00 a.m.; the hearing as to defendant Cornelio Cazarez Madrid will be held at 11:00 a.m. Defendant's sentencing submissions, are due November 24, 2021; the Government's submissions are due December 8, 2021.

The Clerk of Court is directed to terminate the motion at Dkt. No. 66.

SO ORDERED.

Dated: October 26, 2021  
New York, New York

  
\_\_\_\_\_  
GREGORY H. WOODS  
United States District Judge